

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
21 CVS 015426  
21 CVS 500085

NORTH CAROLINA LEAGUE OF  
CONSERVATION VOTERS, INC. et al.,

REBECCA HARPER, et al.,

COMMON CAUSE,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.

Defendants.

**LEGISLATIVE DEFENDANTS' NOTICE  
OF SUBMISSION OF REMEDIAL  
PLANS AND REQUIRED MATERIALS**

On February 17, 2022, the General Assembly enacted SL 2022-2, SL 2022-3, and SL 2022-4 which are Remedial Plans for Congress, the North Carolina Senate, and the North Carolina House of Representatives. In compliance with the North Carolina Supreme Court's February 4, 2022 Order, and this Court's Orders of February 8, and 16, 2022, Legislative Defendants provide this Notice of Submission of Remedial Plans and Required Materials.

Due to the size of the files, these materials will be transmitted via FTP sites. In accordance with Ms. Rossi's December 23, 2021 email, materials will be transmitted to the Court via the Liquid File link included in that email. Because of Liquid File's size upload limitations numerous submissions will be made. The three Special Masters and Counsel in this matter will be provided with a separate link to a FTP site via email. An index of the materials beign submitted by FTP site is below:

- I. **Memorandum** explaining the materials submitted, the Remedial Plans, and the legislative process.
  - a. Exhibit 1 to Memorandum
  - b. Exhibit 2 to Memorandum
  
- II. **2022 Legislative Defendants Remedial Plans**
  - a. Statement of Participants
  - b. Affidavit of Raleigh Myers regarding the loading of election data into Maptitude
  
  - c. **Remedial State House Plan (HB 980/SL 2022-4)**
    - i. Floor Amendments
      - 1. A1 (cover sheet, pdf map, csv, ESRI)
      - 2. A2 (cover sheet, pdf map, csv, ESRI)
      - 3. A3(cover sheet, pdf map, csv, ESRI)
      - 4. A4 (cover sheet, pdf map, csv, ESRI)
      - 5. A5 (cover sheet, pdf map, csv, ESRI)
      - 6. A6 (cover sheet, pdf map, csv, ESRI)
      - 7. A7 (cover sheet, pdf map, csv, ESRI)
    - ii. Alternative maps offered in committee or otherwise
      - 1. Committee Substitute Favorable 2/16/22 (same as Edition 2)
        - a. Color PDFs of Proposed Plan
        - b. Block .csv file
        - c. ERSI shapefile
        - d. StatPack
        - e. Compactness Report
    - iii. Block .csv files
    - iv. Shapefiles
    - v. ESRI shapefiles
    - vi. Color PDF of Proposed Remedial Plan
    - vii. Color PDF of each redrawn county grouping
    - viii. StatPack
    - ix. Compactness Report
  
  - d. **Remedial State Senate Plan (SB 744/SL 2022-2)**
    - i. Floor Amendments
      - 1. A1 (cover sheet, pdf map, csv, ESRI)
      - 2. A2 (cover sheet, pdf map, csv, ESRI)
      - 3. A3 (cover sheet, pdf map, csv, ESRI)
      - 4. A4 (cover sheet, pdf map, csv, ESRI)
      - 5. A5 (cover sheet, pdf map, csv, ESRI)
      - 6. A6 (cover sheet, pdf map, csv, ESRI)
      - 7. A7 (cover sheet, pdf map, csv, ESRI)
      - 8. A8 (cover sheet, pdf map, csv, ESRI)
      - 9. A9 (cover sheet, pdf map, csv, ESRI)
    - ii. Alternative maps offered in committee or otherwise
      - 1. Offer to Senator Blue

- a. Color PDFs
- b. Block .csv files
- c. ESRI shapefiles
- d. StatPacks
- e. Compactness Reports
- 2. SBR22-12 (Blue, prepared, not offered)
  - a. Color PDFs
  - b. Block .csv files
  - c. ESRI shapefiles
  - d. StatPacks
  - e. Compactness Reports
- 3. SBR22-13 (Blue, prepared, not offered)
  - a. Color PDFs
  - b. Block .csv files
  - c. ESRI shapefiles
  - d. StatPacks
  - e. Compactness Reports
- 4. SCG22-8 (Blue, prepared, not offered)
  - a. Color PDFs
  - b. Block .csv files
  - c. ESRI shapefiles
  - d. StatPacks
  - e. Compactness Reports
- 5. SBR22-8 (Blue, prepared, not offered)
  - a. Color PDFs
  - b. Block .csv files
  - c. ESRI shapefiles
  - d. StatPacks
  - e. Compactness Reports
- iii. Block .csv files
- iv. Shapefiles
- v. ESRI shapefiles
- vi. Color PDF of Proposed Remedial Plan
- vii. Color PDF of each redrawn county grouping
- viii. StatPack
- ix. Compactness Report

**e. Remedial Congressional Plan (SB 745/SL 2022-3)**

- i. Floor Amendments
  - 1. A1 (House, Hawkins) (cover sheet, pdf map, csv, ESRI)
  - 2. A1 (Senate, Clark) (cover sheet, pdf map, csv, ESRI)
- ii. Alternative maps offered in committee or otherwise
  - 1. CCC22-3 (Senate) (prepared, but not offered)
    - a. Color PDF
    - b. Block .csv file
    - c. ESRI Shapefile

- d. StatPack
    - e. Compactness Report
  - 2. CBR22-1 (House) (prepared, but not offered)
    - a. Color PDF
    - b. Block .csv file
    - c. ESRI Shapefile
    - d. StatPack
    - e. Compactness Report
  - 3. SB746 (Clark) (identical to A1 floor amendment)
    - a. Color PDF
    - b. Block .csv file
    - c. ESRI Shapefile
    - d. StatPack
    - e. Compactness Report
  - 4. SB747 (Clark)
    - a. Color PDF
    - b. Block .csv file
    - c. ESRI Shapefile
    - d. StatPack
    - e. Compactness Report
- iii. Block .csv files
- iv. Shapefiles
- v. ESRI shapefiles
- vi. Color PDF of Proposed Remedial Plan
- vii. Color PDF of each redrawn individual districts
- viii. StatPack
- ix. Compactness Report

**f. Hearings and Debates**

- i. Transcripts<sup>1</sup>
  - 1. Senate Committee hearings
  - 2. House Committee hearings
  - 3. General Assembly floor debates
- ii. Links to audio and video files

**g. 2022 Remedial Maps County Grouping Overlay**

**III. Member Residence**

- a. Excel file of LDTX16

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<sup>1</sup> The General Assembly does not have an in-house court reporting service and does not generally create transcripts of committee hearings or floor debates. The General Assembly retained court reporting services in order to comply with the Court's order. Given extremely truncated time that the General Assembly had to not only pass plans, but explain and produce documentation of the same, not all transcripts are available. Additional transcripts will be provided to the Court, the Special Masters, and Counsel upon receipt.

- b. Excel files reflecting a few new addresses of Members, and New Members.

**IV. 2021 Enacted Plans for Special Masters**

- a. LDTX15 (2021 Joint Redistricting Criteria)

**b. 2021 House**

- i. LDTX1 (HB 976/SL2021-175)
- ii. LDTX2
- iii. LDTX3
- iv. LDTX4
- v. Block Assignment File
- vi. Shapefile

**c. 2021 Senate**

- i. LDTX5 (SB 739/SL 2021-173)
- ii. LDTX6
- iii. LDTX7
- iv. LDTX8
- v. LDTX9
- vi. LDTX10
- vii. Block Assignment File
- viii. Shapefile

**d. 2021 Congress**

- i. LDTX11 (SB 740/SL 2021-174)
- ii. LDTX12
- iii. LDTX13
- iv. LDTX14
- v. Block Assignment File
- vi. Shapefile

**e. 2021 Additional Stat Packs of Enacted Plans<sup>2</sup>**

**V. Expert Materials**

- a. Report on Remedial Districts of Dr. Barber
- b. Report on Remedial Districts of Dr. Lewis

Respectfully submitted this the 18th day of February, 2022.

/s/ Phillip J. Strach

NELSON MULLINS RILEY &  
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<sup>2</sup> Central Staff made slight adjustments to the format of the “standard” General Assembly Redistricting stat packs for these Remedial Plans. Central Staff re-ran the stat packs for the previously Enacted Plans in this new format, in case it is helpful to the Court and Special Masters.

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**CERTIFICATE OF SERVICE**

It is hereby certified that on this the 18th day of February, 2022, the foregoing was served on the individuals below by email:

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